

1 Ahilan T. Arulanantham (SBN 237841)  
2 arulanantham@law.ucla.edu  
3 CENTER FOR IMMIGRATION LAW AND  
4 POLICY, UCLA SCHOOL OF LAW  
5 385 Charles E. Young Dr. East  
6 Los Angeles, CA 90095  
7 Telephone: (310) 825-1029

8 Emilou MacLean (SBN 319071)  
9 emaclean@aclunc.org  
10 Michelle (Minju) Y. Cho (SBN 321939)  
11 mcho@aclunc.org  
12 Amanda Young (SBN 359753)  
13 ayoung@aclunc.org  
14 ACLU FOUNDATION  
15 OF NORTHERN CALIFORNIA  
16 39 Drumm Street  
17 San Francisco, CA 94111-4805  
18 Telephone: (415) 621-2493  
19 Facsimile: (415) 863-7832

20 Attorneys for Plaintiffs  
21 *[Additional Counsel Listed on Next Page]*

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, et al.,  
Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, UNITED  
STATES DEPARTMENT OF HOMELAND  
SECURITY, and UNITED STATES OF  
AMERICA,

Defendants.

Case No. 3:25-cv-05687-TLT

**DECLARATION OF ERIK CREW IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
CLASS CERTIFICATION**

[Filed concurrently with Motion, supporting  
Attorney Declarations of Ahilan T.  
Arulanantham, Emilou H. MacLean, Jessica  
Karp Bansal; and [Proposed] Order]

Assigned to: Hon. Trina L Thompson

Date: TBD  
Time: 2:00 p.m.  
Place: Courtroom 9

Complaint Filed: July 7, 2025

1 Additional Counsel for Plaintiffs  
2 Jessica Karp Bansal (SBN 277347)  
3 jessica@ndlön.org  
4 Lauren Michel Wilfong (*Pro Hac Vice*)  
lwilfong@ndlön.org  
5 NATIONAL DAY LABORER ORGANIZING NETWORK  
6 1030 S. Arroyo Parkway, Suite 106  
Pasadena, CA 91105  
Telephone: (626) 214-5689  
7 Eva L. Bitrán (SBN 302081)  
8 ebitran@aclusocal.org  
9 Diana Sánchez (SBN 338871)  
dianasanchez@aclusocal.org  
10 ACLU FOUNDATION  
OF SOUTHERN CALIFORNIA  
11 1313 West 8th Street  
Los Angeles, CA 90017  
12 Telephone: (213) 977-5236  
13 Erik Crew (*Pro Hac Vice*)  
ecrew@haitianbridge.org  
14 HAITIAN BRIDGE ALLIANCE  
4560 Alvarado Canyon Road, Suite 1H  
15 San Diego, CA 92120  
Telephone: (949) 603-7411  
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**DECLARATION OF ERIK CREW**

1 I, Erik Crew, hereby declare:

2       1. I am an attorney at law licensed to practice law in the State of New York and am  
 3 admitted *pro hac vice* as counsel of record for Plaintiffs in the instant action. I am a Staff Attorney  
 4 with the Haitian Bridge Alliance (“HBA”) and I make this declaration in support of Plaintiff’s  
 5 Motion for Class Certification. I have personal knowledge of the facts set forth herein, and if called  
 6 upon to testify as a witness thereto, I could and would competently do so under oath.

7       2. In addition to the instant case, I am admitted *pro hac vice* as counsel of record for the  
 8 plaintiffs in *National TPS Alliance v. Noem*, Case No. 3:25-cv-01766 (N.D. Cal. 2025) (“NTPSA I”).

9       3. I received my law degree from Northern Kentucky University’s Chase College of  
 10 Law (Chase) in 2019. Prior to matriculating through the part-time evening division as Chase’s only  
 11 2015 Salmon P. Chase Merit Scholar and only awardee of the 2019 Salmon P. Chase Award, I  
 12 served as a paralegal at the Ohio Justice & Policy Center (OJPC), where I spent four years as the  
 13 only paralegal to class counsel on *Fussel v. Wilkinson*, a complex litigation concerning civil rights  
 14 violations and access to adequate medical care for the class of 50,000 people in Ohio prisons. I was  
 15 the main point-of-contact for class representatives and the class, as well as class counsel’s main  
 16 point-of-contact with the Court-appointed Monitor and its team of experts. I supported the  
 17 investigation, filing, and casework on over 20 individual civil rights actions in the district courts of  
 18 Ohio. During part-time night school for law and since graduation from law school, I have trained and  
 19 received fellowships from renowned institutions at the forefront of international human rights  
 20 litigation and advocacy, movement-centered legal practice, and client-centered litigation in U.S.  
 21 courts, such as the Institute for Justice & Democracy in Haiti (IJDH); the Bureau des Avocats  
 22 Internationaux (BAI) in Port-au-Prince, Haiti; the Center for Constitutional Rights; Black Europe  
 23 Summer School (BESS); and Global Rights Compliance and the Association of Defense Counsel at  
 24 the United Nations Mechanism for the International Criminal Tribunal for the Former Yugoslavia  
 25 (ADC-MICT) in Den Haag, Netherlands.

26       4. HBA is a Black-led, women-led, Haitian Kreyòl-speaking grassroots and community-  
 27 based nonprofit organization that provides migrants and immigrants with humanitarian, legal, and

1 social services, with a particular focus on Black immigrants, the Haitian community, women and  
 2 girls, LGBTQIA+ individuals, and survivors of torture and other human rights abuses, and also  
 3 advocates for fair and humane immigration policies. HBA is headquartered in San Diego, California.

4       5. HBA was incorporated in California in early 2016 to address the needs of an influx of  
 5 Haitian and other Black immigrants seeking humanitarian protections in the U.S. as conditions in  
 6 their countries deteriorated. Informed by that experience, HBA's primary mission is to assist  
 7 recently arrived Haitian and other Black immigrants in acclimating to the United States and ensure  
 8 their success in navigating their new lives. This includes helping them pursue immigration status  
 9 here in the U.S., providing humanitarian services, and administering a welcoming program to assist  
 10 with transitional needs.

11       6. Starting in 2020, HBA has operated a legal department with a small staff of attorneys  
 12 who provide direct representation to Haitian and other Black people in U.S. immigration matters in  
 13 California and other jurisdictions, including people in ICE detention, those in removal proceedings  
 14 before the Executive Office for Immigration Review (EOIR), and those filing applications for  
 15 immigration benefits with USCIS. In addition, HBA's work focuses on local, state, national, and  
 16 international advocacy for fair and humane immigration policies and pathways.

17       7. Since 2020, HBA has expanded its litigation work to include affirmative federal court  
 18 litigation. Since October 2020, as either co-counsel or as an organizational plaintiff, HBA has filed  
 19 at least 3 amicus briefs and 10 cases in the federal district courts. HBA's recent federal court  
 20 litigation has included challenges to immigration related policies brought under the Administrative  
 21 Procedure Act (APA), the Fifth Amendment, and *habeas corpus*, as well as Freedom of Information  
 22 Act (FOIA) litigation. In addition to the instant litigation, HBA is co-counsel in the following  
 23 current cases: *NTPSA I*, No. 25-cv-01766 (N.D. Cal. 2025), *appellate proceedings pending*, No. 25-  
 24 2120 (9th Cir. 2025) (challenging termination of Temporary Protected Status for over one million  
 25 immigrants from Haiti and Venezuela); *Haitian Bridge Alliance v. Biden*, No. CV 21-3317 (D.D.C.  
 26 June 14, 2022) (class action by asylum seekers expelled from the U.S. against various federal  
 27 government officials and departments); *Tex. Civ. Rts. Project, et al., v. U.S. Customs and Border  
 28 Prot.*, No. 1:24-cv-00535 (W.D. Tex. 2024). HBA is an organizational plaintiff in the following

1 current cases: *Al Otro Lado, Inc. v. Trump*, No. 25-cv-01501 (S.D. Cal. 2025) (class action  
 2 challenging the federal government's actions in blocking accessing to asylum at ports of entry along  
 3 the U.S.-Mexico border); *Doe v. Noem*, No. 1:25-cv-10495-IT (D. Mass. 2025), *appellate*  
 4 *proceedings pending*, No. 25-1715 (1st. Cir. 2025) (challenging the federal government's  
 5 termination of several humanitarian parole processes, including Central American Minors Parole,  
 6 Family Reunification Parole, Military Parole-in-Place, Uniting for Ukraine, Operation Allies  
 7 Welcome, and CHNV humanitarian parole); *Center for Constitutional Rights v. U.S. Dep't of*  
 8 *Defense*, No. 25-cv-06214 (S.D.N.Y. 2025).

9       8. I joined HBA in 2021 to spearhead its international human rights advocacy and have  
 10 now appeared before the United Nations Committee on the Elimination of All Forms of Racial  
 11 Discrimination, the United Nations Committee on the Elimination of Discrimination Against  
 12 Women, the United Nations Human Rights Committee, the United Nations Permanent Forum on  
 13 People of African Descent, and the Organization of American States' Inter-American Commission  
 14 on Human Rights, as well as organized and worked with directly-impacted people to deliver their  
 15 testimony before the same Committees.

16       9. Since spring of 2024, I have increasingly prioritized HBA's affirmative federal court  
 17 litigation. I currently serve as co-counsel or as the main organizational plaintiff's point-of-contact on  
 18 HBA's current cases.

19       10. Since the vacatur and termination of Temporary Protected Status (TPS) for Venezuela  
 20 and the partial vacatur of TPS for Haiti, HBA has been working with impacted communities,  
 21 partner-civil-society organizations, and co-counsel to identify and investigate potential claims in  
 22 actions on behalf of people affected by TPS terminations and to pursue them in federal district court.

23       11. HBA and I, in collaboration with co-counsel, will fairly and adequately represent the  
 24 interests of the classes. With significant experience in immigrants' rights issues and class actions,  
 25 including APA and civil rights cases, HBA has more than sufficient resources to litigate this matter  
 26 vigorously.

27       12. If appointed class counsel, I will ensure that my co-counsel and I zealously represent  
 28 the interests of the classes to the best of our collective ability.

13. I am not aware of any conflict among potential class members in this case.

14. I am not aware of any conflicts between HBA and any members of the potential class that would prevent HBA from providing zealous representation to the class.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct to the best of my knowledge. Executed on August 15, 2025, in Brooklyn, New York.

*[Signature]*

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Erik Crew

**CERTIFICATE OF SERVICE**

I hereby certify that on August 15, 2025, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

## NATIONAL DAY LABORER ORGANIZING NETWORK

/s/ Jessica Karp Bansal  
Jessica Karp Bansal  
Lauren Michel Wilfong (*Pro Hac Vice*)